	Case 3:08-cv-000	023-IEG-NLS	Document 6	Filed 03/17/2008	Page 1 of 2			
1 2 3 4 5 6	James G. Sandle SANDLER, LA 402 West Broads San Diego, CA 9 Telephone (619) Facsimile (619) Email: rvaldez@ E-mail: jsandler Attorneys for De H. THOMAS Mo	2101-3542 235-5655 235-5648 2sllbv.com @sllbv.com fendant ORAN, II, Court-	7 BYER & VALDI Appointed	EZ LLP				
7	Receiver of LYD	Receiver of LYDIA CAPITAL, LLC						
8	IN THE UNITED STATES DISTRICT COURT							
9	FOR THE SOUTHERN DISTRICT OF CALIFORNIA							
11								
12	THE LINCOLN COMPANY,	NATIONAL LIF	E INSURANCE	Case No. 08-CV-	00023-IEG-NLS			
13		aintiff,		II'S UNOPPOSEI	THOMAS MORAN, O MOTION FOR TIME TO ANSWER			
14 15	H. THOMAS MO Receiver of LYD	ORAN, II, Court- IA CAPITAL, LI	Appointed LC,	OR OTHERWISE PLEAD				
16	De	efendant.		•				
17								
18	Defendan	t, H. Thomas Mo	ran, II ("Moran"), in accordance with	Local Rule 12.1, moves the			
19	Court to enter an Order extending Moran's deadline for filing his Answer to Plaintiff's Complaint, or							
20	other responsive j	oleading, to Marc	h 31, 2008. In su	upport of his Motion,	Moran states as follows:			
21	1. Pla							
22	January 30, 2008.							
23 24	2. W							
25	due March 18, 2008.							
26	3. Mo	oran has made no	previous reanest	for an extension of ti	me in this case			
27		1 and an analysis of the original original or the original original or the original original original or the original ori						
28								
5. The requested extension of time will not impact other scheduled dates. ::ODMA\PCDOCS\DOCS\19347\1								
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1	6.	Moran seeks this ex	tension to allow su	afficient opportunity to fully investigate the				
2	extensive factual and legal allegations asserted in Plaintiff's Complaint and to prepare his Answer or							
3	responsive pleading to Plaintiff's Complaint. Additionally, the parties are in discussions regarding							
4	certain issues that impact Moran's response to the Complaint, including whether Moran will need to							
5	file a Motion to Dismiss.							
6								
7	WHEREFORE, for good cause shown, Defendant, H. Thomas Moran, II, requests the Court							
8	to enter an Order extending Defendant's time to answer or otherwise plead to March 31, 2008.							
9		Respectfully submitted,						
10	Dated: N	March 17, 2008	SAN	DLER, LASRY, LAUBE, BYER & VALDEZ LLP				
11								
12			By:	/S/				
13				Richard M. Valdez Attorneys for Defendant				
15				H. Thomas Moran, II, Court-Appointed Receiver of Lydia Capital, LLC				
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